

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHANE GUAY,
Defendant.

19-CR-103-JLS-HKS

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal
Public Defender.

DATE, TIME & PLACE:

Hon. John L. Sinatra, Jr., Robert H. Jackson
United States Courthouse, 2 Niagara Square,
Buffalo, New York 14202.

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public
Defender Jeffrey T. Bagley.

RELIEF REQUESTED:

two-week adjournment.

DATED:

April 27, 2020, Buffalo, New York.

Respectfully submitted,

/s/Jeffrey T. Bagley

Jeffrey T. Bagley
Assistant Federal Public Defender
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AFFIRMATION

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I represent Shane Guay.
2. Shane Guay's response to the government's objections to Judge H. Kenneth Schroeder's Report and Recommendation is currently due on April 30, 2020.
3. Due to scheduling constraints, including the representation of several individuals seeking compassionate release due to the COVID-19 pandemic, I respectfully request a two-week adjournment of that deadline, the government's reply time, and the date for oral argument.
4. This is Mr. Guay's first such request.
5. Assistant United States Attorney Meghan Tokash has no objection to this request.

DATED: April 27, 2020, Buffalo, New York.

Respectfully submitted,

/s/Jeffrey T. Bagley

Jeffrey T. Bagley

Assistant Federal Public Defender

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